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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
) No.
vs.)
)
\$6,500.00 IN UNITED STATES) **VERIFIED COMPLAINT FOR**
CURRENCY,) **FORFEITURE IN REM**
)
)
Defendant.)
)
)

Plaintiff, United States of America, by and through counsel, alleges the following:

I. NATURE OF THE ACTION

1. This is a civil action *in rem* brought to enforce the provisions of 18 U.S.C.

§ 981(a)(1)(C) and 21 U.S.C. § 881(a)(6) for the forfeiture of Defendant \$6,500.00 IN
UNITED STATES CURRENCY.

II. JURISDICTION AND VENUE

2. This Court has jurisdiction over this case pursuant to 28 U.S.C. §§ 1345 and 1355.
3. Venue is proper in this Court pursuant to 28 U.S.C. § 1395 because Defendant \$6,500.00 IN UNITED STATES CURRENCY was seized within the District of Alaska.

III. RELEVANT FACTS

4. The Anchorage Airport Interdiction Team (“AAIT”) is a multi-jurisdictional task force based out of the Ted Stevens Anchorage International Airport, sponsored by the Alaska State Troopers. Among other things, AAIT is responsible for investigations that involve drug trafficking into the State of Alaska as well as around the State at various ports of entry to include passengers and luggage arriving at airport terminals; packages, and cargo shipped through parcel delivery services; and commercial cargo carriers.

5. On June 24, 2022, AAIT was alerted to a suspicious parcel (“Parcel #1”) by an employee at a United Parcel Service (“UPS”) facility at the Anchorage airport. Parcel #1 was shipped from a UPS store located in California, with no shipper information, to a UPS store in Eagle River, guaranteed delivery by 08:30 hours, with instructions to hold for the recipient.

6. The listed recipient for Parcel #1 was Christopher Lockyer.
7. The phone number provided to UPS for Parcel #1 as a form of contact for Lockyer was confirmed through public records as belonging to him. Alaska Public Safety

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Information Network (“APSIN”) records show Lockyer as having an address in South Anchorage.

8. Parcel #1 was opened and discovered to have one pound of powdered fentanyl inside (approximate street value of \$20,000).

9. On July 12, 2022, AAIT observed a suspicious manila envelope (“Parcel #2”) at the UPS facility at the Anchorage airport.

10. Parcel #2 had a large amount of clear packing tape and was marked with a “Next Day Air” sticker.

11. The shipping information on the label for Parcel #2 stated that it had been sent by Janeal McCullough, with a listed address in South Anchorage, and the recipient for the parcel was listed as Jessica Darlene Hess in Long Beach, California.

12. Parcel #2 was opened and discovered to have \$6,500 in U.S. currency inside concealed between several blank sheets of paper.

13. The currency inside Parcel #2 was analyzed with an Ion Scan 600, which is a highly sensitive, non-radioactive, lightweight, portable desktop system that detects and identifies trace amounts of explosives and narcotics. The Ion Scan indicated the presence of fentanyl on the currency.

14. A search of law enforcement databases shows that McCullough has a listed address in South Anchorage.

15. Law enforcement records show that McCullough has a criminal record to include weapons misconduct, criminal mischief, reckless driving, furnishing alcohol to a minor, driving under the influence, burglary, assault, and controlled substance violation.

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16. A search of public records shows that the recipient address for Parcel #2 is a local pharmacy in Long Beach which is also used as an UPS access point. Public records show no indication of a “Jessica Darlene Hess” associated with that recipient address.

17. Based on the training and experience of AAIT officers, shippers of illegal controlled substances and proceeds derived from the sale of controlled substances use shipping store addresses instead of the recipient’s own address in order to conceal their identities from law enforcement.

18. AAIT seized the currency as suspected drug trafficking proceeds.

19. On July 13, 2022, AAIT officers were informed that McCullough was at the UPS shipping facility inquiring why Parcel #2 had not reached its destination and why she had not received any updates on its status. AAIT also learned that McCullough arrived at the UPS facility in a vehicle registered to Lockyer.

20. On July 26, 2022, AAIT discovered another parcel (Parcel #3) at the Anchorage airport that was being shipped to Lockyer to the same UPS store in Eagle River as Parcel #1, with instructions to hold for pickup.

21. Parcel #3 was shipped from a UPS store in Long Beach.

22. Parcel #3 was opened and discovered to have one pound of powdered fentanyl inside.

23. On July 26, 2022, at approximately 15:30 hours, McCullough and a male visited the UPS airport facility and inquired about Parcel #3. The vehicle McCullough

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and the male arrived in was listed as registered to Lockyer and was involved in a controlled delivery in November of 2021 where two people were arrested.

24. The Drug Enforcement Agency (“DEA”) has provided notice pursuant to 18 U.S.C. § 983 to administratively forfeit Defendant \$6,500.00 IN UNITED STATES CURRENCY as drug trafficking proceeds.

25. On September 18, 2022, McCullough submitted a claim to DEA for Defendant \$6,500.00 IN UNITED STATES CURRENCY. In the claim, McCullough alleges that she saved the money in her “piggy bank.”

26. Defendant \$6,500.00 IN UNITED STATES CURRENCY is presently in the possession, custody, or control of the United States and is not presently subject to any judicial restraining order.

27. Defendant \$6,500.00 IN UNITED STATES CURRENCY is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6) because, in violation of in violation of 21 U.S.C. § 841(a)(1), it was furnished or intended to be furnished by any person in exchange for a controlled substance, it constitutes proceeds traceable to such an exchange, and was used or intended to be used to facilitate the sale and exchange of a controlled substance.

IV. CLAIM FOR RELIEF

WHEREFORE, Plaintiff United States of America prays that:

A. A Warrant *In Rem* issue for the arrest of Defendant \$6,500.00 IN UNITED STATES CURRENCY;

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B. That due notice be given to all parties to appear and show cause why the forfeiture should not be decreed;

C. That judgment be entered declaring Defendant \$6,500.00 IN UNITED STATES CURRENCY forfeited to the United States of America for disposition according to law, and

D. For such relief as this Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED this 16th day of December, 2022, in Anchorage, Alaska.

S. LANE TUCKER
United States Attorney

s/ Seth M. Beausang
SETH M. BEAUSANG
Assistant U.S. Attorney
United States of America

CERTIFICATE OF SERVICE

I hereby certify that on December 16th, 2022, a true and correct copy of the foregoing was served by certified mail on the following:

Janeal McCullough
1300 W 82nd Ave
Anchorage, AK 99518

s/ Seth M. Beausang
Office of the U.S. Attorney

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VERIFICATION

I, David A. Rose, hereby verify and declare under the penalty of perjury that I am a Special Agent of the United States Drug Enforcement Agency, that I have read the foregoing Verified Complaint for Forfeiture *In Rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to the best of my knowledge and belief. The sources of my knowledge and information and the grounds for my belief include official files and records of the United States, publicly available files and historical information, files and records compiled by local and state law enforcement agencies, information supplied to me by other law enforcement officers and other witnesses, as well as my investigation in this case, together with others, as well as my training and experience.

Executed this 8 day of December, 2022, in Anchorage, Alaska.



David A. Rose
Special Agent
U.S. Drug Enforcement Agency

Declarations have the same legal force as affidavits. 28 U.S.C. § 1746

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